

May 30, 2002

Mr. Jack Broadbent  
Director, Air Management Division  
**United States Environmental Protection Agency**  
75 Hawthorne Street  
San Francisco, CA 94105

Dear Mr. Broadbent:

The requirements for public and EPA review of the following proposed Major Facility Review Permit have been completed:

**ALAMEDA COUNTY**  
Roberta Cooper  
Scott Haggerty  
(Vice-Chairperson)  
Nate Miley  
Shelia Young

**CONTRA COSTA COUNTY**  
Mark DeSaulnier  
Mark Ross  
Gayle Uilkema

**MARIN COUNTY**  
Harold C. Brown, Jr.

**NAPA COUNTY**  
Brad Wagenknecht

**SAN FRANCISCO COUNTY**  
Chris Daly  
(Vacant)  
(Vacant)

**SAN MATEO COUNTY**  
Jerry Hill  
Marland Townsend  
(Secretary)

**SANTA CLARA COUNTY**  
Randy Attaway  
(Chairperson)  
Liz Kniss  
Julia Miller  
Dena Mossar

**SOLANO COUNTY**  
William Carroll

**SONOMA COUNTY**  
Tim Smith  
Pamela Torliatt

William C. Norton  
INTERIM CEO/EXECUTIVE  
SECRETARY

Ellen Garvey  
Air Pollution Control Officer

Facility #	Facility Name	Application #
B1661	Rhodia, Inc.	25842

The District received two comment letters. The first letter, dated May 16, 2002, was from Anthony Koo, the environmental coordinator at your facility. The second letter, dated May 17, 2002, was from Ken Kloc, Staff Scientist for the Environmental Law and Justice Clinic at Golden Gate University in San Francisco.

In response to Mr. Kloc's letter, the District made the following changes:

- The District has determined that S-54, Alky Sulfuric Acid and Lubricant Spent Acid Process Tank, is subject to BAAQMD Regulation 8-5-301 and 8-5-311.
- The District has determined that S-55, LSA Truck Receiving Facility, is subject to BAAQMD Regulation 8-2-301.
- The visible emissions monitoring requirement in Condition 13337, Part 18, has been added to Tables VII-K and VII-L.
- Condition 2756, Part 2, regarding odor complaints, has been deleted.
- The pressure drop at A-7 shall be measured and recorded on a weekly basis.
- A requirement to add a flowmeter, to determine the minimum flowrate, and to measure and record flowrate weekly has been added for A-7, which abates S-49, Fluidized Bed Dryer.
- A-16 and A-17, Brinks Mist Eliminators, shall be monitored for visible emissions on a quarterly basis instead of an annual basis.

Various corrections were made in response to the letter from Mr. Koo of Rhodia. The detail is contained in the permit transmittal letter to Mr. Jurichko, which is attached. In general, typographical errors were corrected and citations were corrected. In several cases, no monitoring is allowed if sources do not operate during the permit term. Visible emissions monitoring has been modified to allow the use of a certified observer. Throughput limits were not changed.

After considering all comments and making appropriate revisions, the District has made a decision to issue the Major Facility Review Permit.

Enclosed for your information are copies of the final permit, the letters from Ken Kloc and Rhodia, the response to Ken Kloc, and the transmittal letter to Rhodia, which contains the response to Rhodia. If you have any questions regarding this project, please call Steve A Hill, Air Quality Engineering Manager, at (415) 749-4673.

Sincerely yours,

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Ellen Garvey  
Air Pollution Control Officer

Enclosures

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